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11      *Counsel for Defendant*  
12      Seven Networks, LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

17 INTEL CORPORATION and APPLE INC.,

Case No. 3:19-cv-07651-EMC

18 | Plaintiffs.

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20 FORTRESS INVESTMENT GROUP LLC,  
FORTRESS CREDIT CO. LLC, UNILOC  
21 2017 LLC, UNILOC USA, INC., UNILOC  
LUXEMBOURG S.A.R.L., VLSI  
22 TECHNOLOGY LLC, INVIT SPE LLC,  
INVENTERGY GLOBAL, INC., IXI IP, LLC,  
23 and SEVEN NETWORKS, LLC.

**PLAINTIFF APPLE INC.'S AND  
DEFENDANT SEVEN NETWORKS,  
LLC'S JOINT MOTION TO DISMISS  
WITH PREJUDICE APPLE'S CLAIMS  
AGAINST SEVEN NETWORKS**

24 | Defendants.

1 Pursuant to the terms of a settlement agreement between Plaintiff Apple Inc. (“Apple”) and  
 2 Defendant SEVEN Networks, LLC (“SEVEN”), Apple and SEVEN hereby jointly move this Court  
 3 pursuant to Federal Rule of Civil Procedure 41(a)(2) to: (i) dismiss from this action with prejudice  
 4 all of Apple’s claims and requests for damages, injunctive relief, rescission, divestiture and any and  
 5 all other relief sought or that could have been sought in this action by Apple against SEVEN, and  
 6 (ii) dismiss with prejudice those portions of Apple’s claims and requests for damages, injunctive  
 7 relief, rescission, divestiture and any and all other relief sought or that could have been sought in this  
 8 action by Apple against Defendants Fortress Investment Group LLC, Fortress Credit Co. LLC,  
 9 Uniloc 2017 LLC, Uniloc USA, Inc., Uniloc Luxembourg S.A.R.L., VLSI Technology LLC, INVT  
 10 SPE LLC, Inventergy Global, Inc., and IXI IP, LLC (collectively, “Co-Defendants”) that are based  
 11 on allegations or conduct involving SEVEN or any SEVEN Patents (i.e., any patents assigned to,  
 12 owned by, or controlled by SEVEN), including but not limited to the acquisition of SEVEN and/or  
 13 the SEVEN Patents and the licensing, enforcement and litigation of any SEVEN Patents  
 14 (collectively, “SEVEN Matters”). For avoidance of doubt, the dismissal of such claims and requests  
 15 for relief will cover only the portions of those claims and requests for relief that are based on  
 16 allegations or conduct involving SEVEN Matters; any portions of those claims and requests for relief  
 17 that are not based on allegations or conduct involving SEVEN Matters shall not be dismissed.  
 18 Nothing herein requires dismissal by Apple of any count in the Amended Complaint.

19 Apple and SEVEN further agree that all attorneys’ fees, costs of court, and expenses shall be  
 20 borne by each party incurring the same.

21 Dated: December 2, 2020

22 By: /s/ Mark D. Selwyn

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27 -- Joseph J. Mueller (*pro hac vice*)

Respectfully submitted,

By: /s/ Samuel F. Baxter

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 SEVEN NETWORKS, LLC

PLAINTIFF APPLE INC.’S AND DEFENDANT SEVEN NETWORKS,  
 LLC’S JOINT MOTION TO DISMISS WITH PREJUDICE APPLE’S CLAIMS  
 AGAINST SEVEN NETWORKS,  
 Case No. 3:19-cv-07651-EMC

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14     *Attorneys for Plaintiff Apple Inc.*

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**ECF ATTESTATION**

I, Samuel F. Baxter, am the ECF user whose ID and password are being used to file  
PLAINTIFF APPLE INC. AND DEFENDANT SEVEN NETWORKS, LLC JOINT MOTION  
TO DISMISS WITH PREJUDICE PLAINTIFF APPLE INC.'S CLAIMS AGAINST  
DEFENDANT SEVEN NETWORKS, LLC. I hereby attest that I received authorization to insert  
the signatures indicated by a conformed signature (/s/) within this e-filed document.

By: /s/ *Samuel F. Baxter*

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

4

INTEL CORPORATION and APPLE INC.,

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Plaintiffs,

6

v.

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FORTRESS INVESTMENT GROUP LLC,  
FORTRESS CREDIT CO. LLC, UNILOC  
2017 LLC, UNILOC USA, INC., UNILOC  
9 LUXEMBOURG S.A.R.L., VLSI  
TECHNOLOGY LLC, INVT SPE LLC,  
10 INVENTERGY GLOBAL, INC., IXI IP, LLC,  
and SEVEN NETWORKS, LLC,

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Defendants.

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Case No. 3:19-cv-07651-EMC

[PROPOSED] ORDER GRANTING  
PLAINTIFF APPLE INC.'S AND  
DEFENDANT SEVEN NETWORKS,  
LLC'S JOINT MOTION TO DISMISS  
WITH PREJUDICE APPLE'S CLAIMS  
AGAINST SEVEN NETWORKS

1 Presently before the Court is the JOINT MOTION TO DISMISS WITH PREJUDICE  
 2 APPLE'S CLAIMS AGAINST SEVEN NETWORKS, filed by Plaintiff Apple Inc. ("Apple") and  
 3 Defendant SEVEN Networks, LLC ("SEVEN"). Apple and SEVEN have advised the Court that  
 4 they have settled their claims against each other in this matter pursuant to the terms of a settlement  
 5 agreement between Apple and SEVEN. The Court GRANTS the Joint Motion, and hereby (i)  
 6 dismisses from this action with prejudice all of Apple's claims and requests for damages, injunctive  
 7 relief, rescission, divestiture and any and all other relief sought or that could have been sought in this  
 8 action by Apple against SEVEN, and (ii) dismisses with prejudice those portions of Apple's claims  
 9 and requests for damages, injunctive relief, rescission, divestiture and any and all other relief sought  
 10 or that could have been sought in this action in this action by Apple against Defendants Fortress  
 11 Investment Group LLC, Fortress Credit Co. LLC, Uniloc 2017 LLC, Uniloc USA, Inc., Uniloc  
 12 Luxembourg S.A.R.L., VLSI Technology LLC, INVT SPE LLC, Inventergy Global, Inc., and IXI  
 13 IP, LLC (collectively, "Co-Defendants") that are based on allegations or conduct involving SEVEN  
 14 or any SEVEN Patents (i.e., any patents assigned to, owned by, or controlled by SEVEN), including  
 15 but not limited to the acquisition of SEVEN and/or the SEVEN Patents and the licensing,  
 16 enforcement and litigation of any SEVEN Patents (collectively, "SEVEN Matters"). For avoidance  
 17 of doubt, the dismissal of such claims and requests for relief will cover only the portions of those  
 18 claims and requests for relief that are based on allegations or conduct involving SEVEN Matters;  
 19 any portions of those claims and requests for relief that are not based on allegations or conduct  
 20 involving SEVEN Matters shall not be dismissed. Nothing herein requires dismissal by Apple of  
 21 any count in the Amended Complaint.

22 All attorneys' fees, costs of court, and expenses shall be borne by each party incurring the  
 23 same.

24 **IT IS SO ORDERED.**

25  
 26 DATED: \_\_\_\_\_

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 28 EDWARD M. CHEN  
 UNITED STATES DISTRICT JUDGE